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11 *Attorneys for Plaintiff, Bank of America, N.A.*

12 **UNITED STATES DISTRICT COURT**
13 **DISTRICT OF NEVADA**

14 BANK OF AMERICA, N.A.,

15 Plaintiff,

16 vs.

17 NORTH AMERICAN TITLE INSURANCE
18 COMPANY,

19 Defendants.

Case No.: 2:21-cv-00584-KJD-NJK

20 **ORDER TO**
21 **EXTEND DEADLINE TO FILE A**
22 **PROPOSED DISCOVERY PLAN**

23 **(First Request)**

24 Plaintiff, Bank of America, N.A. (“BANA”) and Defendant, North American Title
25 Insurance Company (“NATIC”), by and through their undersigned counsel, stipulate and agree
26 as follows:

- 27 1. On April 8, 2021, BANA filed its Complaint in Eighth Judicial District Court, Case No.
28 A-21-832600-C [ECF No. 1-1];
2. On April 9, 2021, NATIC filed a Petition for Removal to this Court [ECF No. 1];
3. On December 19, 2022, the Parties filed a Joint Status Report advising the Court that the
Parties attended a private mediation on September 29, 2022, which did not result in
settlement. The Parties requested thirty (30) days to submit their proposed discovery plan
[ECF No. 22];
4. Counsel for BANA needs additional time to confer with its client in light of the recent
holidays and is requesting an additional thirty (30) days, through and including February
17, 2023, to file the proposed discovery plan;

1 5. Counsel for NATIC does not oppose the requested extension;

2 6. This is the first request for an extension which is made in good faith and not for purposes
3 of delay.

4 **IT IS SO STIPULATED.**

5 DATED this 18th day of January, 2023.

DATED this 18th day of January, 2023.

6 WRIGHT, FINLAY & ZAK, LLP

SINCLAIR BRAUN LLP

7 /s/ Lindsay D. Dragon, Esq.

/s/ Kevin S. Sinclair, Esq.

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*Attorneys for Defendant, North American
Title Insurance Company*

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15 **IT IS SO ORDERED.**

16 Dated this 19th day of January, 2023.

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UNITED STATES DISTRICT COURT JUDGE